

1 Edith Sanchez Shea (SBN 177578)
2 E-mail: eshea@bwslaw.com
3 BURKE, WILLIAMS & SORENSEN, LLP
4 444 South Flower Street, 40th Floor
5 Los Angeles, California 90071-2942
6 Tel: 213.236.0600 | Fax: 213.236.2700

7
8 Attorneys for Defendant
9 Rainbow K Jewelry SAS

10 Michael J. Saltz, Esq. (SBN 189751)
11 Email: msaltz@jrsnd.com
12 Simone E. Poyourow, Esq. (SBN 346420)
13 Email: spoyourow@jrsnd.com
14 JACOBSON, RUSSELL, SALTZ, NASSIM &
15 DE LA TORRE, LLP
16 1880 Century Park East, Suite 900
17 Los Angeles, CA 90067
18 Tel: (310) 446-9900 | Fax: (310) 446-9909

19
20 Attorneys for Plaintiff Susan Oster d/b/a
21 Feral Jewelry

22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

Susan Oster d/b/a/ Feral Jewelry, an
individual,

Plaintiff,

v.

Rainbow K Jewelry SAS, a French
joint-stock company; mytheresa.com
GmbH, a German entity; Schoola, Inc.
d/b/a Olivela.com, a Delaware
corporation; SoPicks, an Italian entity;
Eastward Bound Technology, Inc.
d/b/a Vugstyle, Inc., a Colorado
corporation; Last Resort, LLC, a
California company; and DOES 1-50,
inclusive,

Defendants.

Case No. 2:25-cv-04929 JLS (PDx)

**JOINT STIPULATION TO
EXTEND DEFENDANT RAINBOW
K JEWELRY SAS' TIME TO
RESPOND TO FIRST AMENDED
COMPLAINT AND SETTING
BRIEFING SCHEDULE AND
HEARING DATE FOR
DEFENDANT'S MOTION TO STAY**

*Filed concurrently with Declaration of
P. Branko Pejic and (Proposed) Order*

Judge: Hon. Josephine L. Staton

1 **TO THE COURT, THE PARTIES, AND THEIR ATTORNEYS OF**
2 **RECORD:**

3 WHEREAS on November 25, 2025, Plaintiff Susan Oster (“Plaintiff”) filed a
4 First Amended Complaint (“FAC”) in the Central District of California against
5 Defendant Rainbow K Jewelry SAS (“Rainbow K”) (D.I. 54), among others, adding
6 new parties and a new U.S. Copyright Registration;

7 WHEREAS counsel for Plaintiff and Rainbow K have met and conferred
8 pursuant to Local Rule 7-3 regarding both the response to the FAC and Defendant’s
9 Motion to Stay and continue to engage in settlement discussions;

10 WHEREAS counsel for Plaintiff and Rainbow K acknowledge the upcoming
11 Holiday Season and that the newly added parties are being served;

12 WHEREAS counsel for Plaintiff and Rainbow K stipulate to request the
13 Court to continue Rainbow K’s time to respond to the FAC and set the below
14 briefing schedule for Defendant’s Motion to Stay:

15

EVENT	DATE
Oster Opposition to Motion to Stay due	January 14, 2026
Rainbow K Reply due	January 28, 2026
Hearing at 10:30 am	February 20, 2026
Rainbow K’s response to the FAC, if necessary	Twenty-one (21) days after the Court rules on Defendant’s Motion to Stay

21

22 WHEREAS counsel for Rainbow K is providing a declaration describing the
23 good cause for the request.

24 ///

25 ///

26 ///

27 ///

28 ///

1 **IT IS SO STIPULATED.**

2 Respectfully submitted,

3

4 Dated: December 9, 2025

BURKE, WILLIAMS & SORENSEN, LLP

5

6 By: s/ Edith Sanchez Shea

7 Edith Sanchez Shea
8 Attorneys for Defendant
Rainbow K Jewelry SAS

9

10 Dated: December 9, 2025

JACOBSON, RUSSELL, SALTZ,
NASSIM & DE LA TORRE, LLP

11

12 By: s/ Simone E. Poyourow

13 Simone E. Poyourow
14 Attorneys for Plaintiff
Susan Oster d/b/a Feral Jewelry

15

16

17 **SIGNATURE ATTESTATION**

18 Pursuant to Local Rule 5-4.3.4(a)(2)(i), I hereby certify that the content of this
19 document is acceptable to Simone E. Poyourow, counsel for Plaintiff Susan Oster,
20 and that I have obtained Ms. Poyourow's authorization to affix her electronic
21 signature to this document.

22

23 Dated: December 9, 2025

BURKE, WILLIAMS & SORENSEN, LLP

24

25 By: s/ Edith Sanchez Shea

26 Edith Sanchez Shea
27 Attorneys for Defendant
Rainbow K Jewelry SAS